

June 30, 2005

VIA HAND DELIVERY

Charles L.A. Terreni Chief Clerk & Administrator South Carolina Public Service Commission 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210



RE:

Petition to Establish Generic Docket to Consider Amendments to Interconnections Agreements Resulting From Changes of Law SC PSC Docket No. 2004-316-C

Dear Mr. Terreni:

This letter is filed on behalf of the Competitive Carriers of the South ("CompSouth")¹, in response to the Agenda Item #6 in the above-referenced docket. Per this Agenda Item, the Commission will discuss a timeline for parties to file responses to BellSouth Telecommunications, Inc.'s Motion for Summary Judgment or, in the Alternative, Motion for Declaratory Ruling.

CompSouth intends to file a response to the Motion. CompSouth seeks the normal response time of up to 30 days to file a response. As the Commission can understand, this docket is very technical and an appropriate response will require ample time to respond. However, if the Commission feels compelled for a shorter response deadline, CompSouth can file a response by July 15, 2005.

CompSouth also wants to inform the Commission of the importance of the timing of ruling on BellSouth's Motion. If the Commission issues a decision prior to the hearing scheduled to begin October 17, 2005, the "losing" party may be compelled to file an appeal. Needless to say, such an appeal could complicate procedurally the case.

CompSouth respectfully requests the Commission consider these comments during its deliberation on this important Agenda Item.

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¹ The member companies of CompSouth participating in this filing include: ITC^DeltaCom Communications, Inc., LecStar Telecom, Inc., Network Telephone Corporation, Navigator Telecommunications, LLC., Supra Telecom and Trinsic. Several members of CompSouth are filing separate pleadings. ITC^DeltaCom filed a letter regarding BellSouth's proposed actions to breach its interconnection agreement with this Commission on or about February 25, 2005 and a Brief and Proposed Order on March 8, 2005.



By copy of this correspondence, I am serving all parties of record.

Sincerely,

Robert E. Tyson, Jr.

RETjr:alw Enclosures

cc:

All Parties of Record (via e-mail)